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NCIC HPV
Sent by: Mary-Beth Weaver

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To: NCIC HPV, moran.matthew@epa.gov
cc:
cc:
Subject: Environmental Defense comments on the proposed Metal Carboxylates category

Richard_Denison@environmentaldefense.org on 05/19/2003 02:34:59 PM

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Subject: Environmental Defense comments on the proposed Metal Carboxylates category

(Submitted via Internet 5/19/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, lucierg@msn.com and jonesl@socma.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for the proposed Metal Carboxylates category.

This test plan proposing a category covers 20 metal carboxylates, each having its own separate CAS number. The test plan and robust summaries were prepared by Morningstar Consulting on behalf of the Metal Carboxylates Coalition of SOCMA. The metal carboxylates are used as metal catalysts in a wide array of reactions, including the synthesis of ink and paint driers, insect repellents, adhesion promoters in tire manufacture, many polyurethane products, heat stabilizers in plastics and friction modifiers for lubricants and greases.

The justification provided for the proposed category is based on the fact that the metal carboxylates all dissociate to the metal cation and the carboxylic acid in biological systems and both constituents are bioavailable. The sponsor proposes six subcategories based on claims of similarity between various carboxylic acid moieties.

The justification for the proposed category is weak and not scientifically supported. The metals comprising this category are cobalt, zinc, zirconium, aluminum, barium and tin. In addition, some of the carboxylics are calcium, potassium and acetate salts. Each of the metals included in the proposed category possess a different spectrum of biological properties, and because the metals are readily released in biological systems, they are free to exert their distinct biological properties. Since one of the primary principles for category formation within the HPV program is a requirement for common toxicological properties, the proposed category is scientifically inappropriate and inconsistent with HPV program guidelines.

In general, this test plan is written in a confusing manner, and the 814-page robust summary is also difficult to read and surprisingly incomplete. For example, the reader is told to look elsewhere for data on the toxic properties of the metal cations which are released upon dissociation of the metal carboxylates. It's puzzling why data on the metals themselves would not be included, as they are the constituents of greatest concern.

We recognize that there may be adequate data for SIDS endpoints on some of the individual chemicals included in this submission, but quite frankly the plan and robust summaries are written in such a confusing way it is not

reasonable to evaluate the plan for individual chemicals or the proposed subcategories. We recommend that the sponsor submit new test plans and robust summaries for each of the chemicals so that we and others can evaluate the adequacy of the existing data in relation to the requirements of the HPV program. If any categories are proposed in the resubmission, they should be based on commonalities in structure and biological and toxic properties of the proposed members.

Thank you for this opportunity to comment.

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